

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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MONROE COUNTY EMPLOYEES' : Civil Action No. 1:21-cv-00722-JPO
RETIREMENT SYSTEM, Individually and on :
Behalf of All Others Similarly Situated, : CLASS ACTION
: Plaintiff, :
: vs. :
: ASTRAZENECA PLC, PASCAL SORIOT, :
: MARC DUNOYER and MENELAS :
: PANGALOS, :
: Defendants. :
: VLADIMIR ZHUKOV, Individually and on : Civil Action No. 1:21-cv-00825-JPO
: Behalf of All Others Similarly Situated, :
: Plaintiff, : CLASS ACTION
: vs. :
: ASTRAZENECA PLC, PASCAL SORIOT, :
: MARC DUNOYER and MENELAS :
: PANGALOS, :
: Defendants. :
:

x

NOTICE OF MOTION FOR CONSOLIDATION OF RELATED ACTIONS, APPOINTMENT
AS LEAD PLAINTIFF, AND APPROVAL OF LEAD PLAINTIFF'S SELECTION OF LEAD
COUNSEL

TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

PLEASE TAKE NOTICE that class member and proposed lead plaintiff Wayne County Employees' Retirement System (the "Retirement System") will move this Court, on a date and at such time as may be designated by the Court, in Courtroom 706 of the Thurgood Marshall United States Courthouse, 40 Foley Square, New York, New York 10007, for an order: (1) consolidating the above-captioned related securities class actions pursuant to Rule 42(a) of the Federal Rules of Civil Procedure; (2) appointing the Retirement System as Lead Plaintiff pursuant to the Private Securities Litigation Reform Act of 1995 ("PSLRA"), 15 U.S.C. §78u-4, *et seq.*; and (3) approving its selection of Robbins Geller Rudman & Dowd LLP as Lead Counsel for the proposed class. In support of this Motion, the Retirement System submits the accompanying Memorandum of Law, the Declaration of David A. Rosenfeld, and a [Proposed] Order.

DATED: March 29, 2021

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s/ David A. Rosenfeld
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Additional Counsel for [Proposed] Lead Plaintiff

CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that on March 29, 2021, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses on the attached Electronic Mail Notice List, and I hereby certify that I caused the mailing of the foregoing via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

s/ David A. Rosenfeld
DAVID A. ROSENFELD

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